

# Kramer Levin



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**April 12, 2024**

Via ECF

The Honorable Denise L. Cote  
United States District Judge  
United States District Court, Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Request to Extend Time to Answer and Reschedule Initial Conference –  
Quantum Technology Innovations, LLC v. Pandora Media, LLC, Case No. 1:24-cv-01102

Dear Judge Cote:

We represent Pandora Media, LLC (“Pandora”) in the above-referenced action. To date, Plaintiff Quantum Technology Innovations, LLC (“Plaintiff” or “Quantum Technology”) has not yet served Pandora with the Complaint in this action. We have conferred with Plaintiff’s counsel and have agreed that we will accept service of the Complaint on behalf of Pandora. The Parties have further conferred and jointly request that (1) the deadline for Pandora’s response to the Complaint be extended to June 20, 2024 and (2) the initial pretrial conference currently set for April 18, 2024 (D.I. 7) be adjourned and rescheduled for such a date that is convenient for the Court and after the response to the Complaint has been filed.

This is the Parties’ first request for an extension of time in this action and the proposed dates will not impact any other deadlines as none have currently been set.

Respectfully submitted,

Mark A. Baghdassarian

cc: All counsel of record (via ECF)